GE Silicones WV, L.L.C.
Sistersville Plant
3500 South State Route 2
Friendly, WV 26146
(304) 652-8000

July 29, 2004

Ms. Allyn Turner, Director
West Virginia Department of Environmental Protection
Water and Waste Management Division
1356 Hansford Street
Charleston, WV 25301

Re: Sistersville, WV Plant
EPA ID # WVD004325353

Dear Ms. Turner:

On May 24, 2004, GE Silicones reported a detection of chlorobenzene in Monitoring Well EP-21. At that time, the Sistersville Plant initiated Appendix IX sampling of the Environmental Protection Area as required by Section IX-H.2.a of the facility's Part B Permit #WVD004325353. This sampling was conducted because, at the time, we believed a statistically significant increase above the background value for chlorobenzene had occurred in the sample from groundwater monitoring well EP-21.

We have found additional information indicating that chlorobenzene had previously been detected in EP-21 in the 3rd Quarter of 1999. This information was communicated in a letter to the agency dated November 19, 1999. A copy of the letter is attached. During the 2nd, 3rd, and 4th quarters of 2003 and the 1st and 2nd quarters of 2004, chlorobenzene levels were again detected in Monitoring Well EP-21. As was stated in the 1999 letter, chlorobenzene levels are not unexpected in EP-21 since the monitoring well is in the downgradient path of migration from the North Inactive Site to the plant's groundwater recovery well.

The groundwater recovery well is serving to both remediate a localized area of acidic groundwater in the plant (under the RCRA Part B permit) as well as capture any pollutants that migrate from the North Inactive site (under the RCRA Corrective Action permit). Chlorobenzene has been detected in the North Inactive Site monitoring wells since 1988.

The level of chlorobenzene in EP-21 ranged from 8 to 26 parts per billion (ppb) during 2003 and to date in 2004 with a slight increase over time. The level in the North Inactive Site monitoring well NF-8 ranged from 55 to 87 ppb during the same time frame and has been trending downward since the first quarter of 2003. Again, this is expected as the recovery well captures groundwater that may migrate from the North Inactive Area.

The observed values of chlorobenzene are well below the groundwater MCL of 100 ug/l. We believe the levels at which chlorobenzene was detected in EP-21 are well understood, the source is well documented, and that groundwater contaminant control measures are functioning as anticipated. As was also stated in the 1999 letter, we did not believe the finding of chlorobenzene in EP-21 to be of high concern and determined that Appendix IX sampling was not necessary at that point in time. Hence, Appendix IX sampling was not necessary at this time either.

However, the Sistersville Plant conducted Appendix IX sampling in each groundwater monitoring well associated with the Environmental Protection Area . The samples were sent to REI Consultants in Beaver, West Virginia for analysis. Chlorobenzene was detected in EP-21 at 21.9 ppb, EP-12A at 3.8 ppb, and EP-13A at 1.4 ppb. All three of these wells are in the same proximity as shown in the attached drawing. In addition, 1,1-Dichloroethane was detected in EP-21 at 19.1 ppb. 1,1-Dichloroethane was detected in the North Inactive Area during three quarters in 1999 and was reported to the agency in the annual groundwater monitoring report for 1999. No other volatile compounds were detected in the monitoring wells.

Total hexachlorodibenzofurans (HxCDF) were detected in EP-20 at 1.0 parts per trillion (ppt). The source of the furan, if actually present, is unknown. We are in process of reviewing the QA/QC data from the laboratory and may resample depending on the data quality review.

Various metals were detected at low concentrations, indicative of naturally occurring background levels. No semivolatiles, pesticides, cyanide, sulfide, PCBs, or dioxins were detected in the monitoring wells in the Environmental Protection Area.

The results of the Appendix IX sampling serve to confirm that the groundwater recovery system is effectively capturing groundwater as it flows downgradient from the North Inactive Site. The quality of the groundwater in the Environmental Protection Area is consistent with historically detected constituents in the path of migration to the recovery well.

The Sistersville Plant will continue to monitor the wells in the Environmental Protection Area on a quarterly basis and add 1,1-Dichloroethane to the annual report.

Once again, chlorobenzene levels in EP-21 confirm that the groundwater recovery system is operating correctly. In addition, we request that continuous future detections of chlorobenzene and 1,1-Dichloroethane not continue to trigger Appendix IX sampling. If the levels of chlorobenzene or 1,1-Dichloroethane were to decrease to levels consistent with the background well EP-10, and then show a statistically significant increase after such time, the requirements for Appendix IX sampling would again be triggered based upon this request.

If you have any questions concerning this report, please call me at (304) 652-8127.

Sincerely,
GE Silicones WV, L.L.C.

Tina N. Adams, P.E.
Sr. Environmental Engineer

c: Fred Dailey - GE
Dennis Heintzman - GE
Steve Pierce - GE
Ray Hiley – GE
James Duranti - WVDEP
State File

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